

1 MARTIN SABELLI (164772)
2 Law Offices of Martin Sabelli
3 740 Noe Street
4 San Francisco, CA 94114
5 Tel: (415) 298-8435
6 Fax: (415) 520-5810
7 msabelli@sabellilaw.com

8
9
10 Attorney for
11 MAURICE BIBBS

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 Case No. CR 07 CR 336-01 WHA

19 **STIPULATION AND PROPOSED
20 ORDER CONTINUING STATUS
21 HEARING TO DECEMBER 13, 2016**

22 vs.

23 MAURICE BIBBS,

24 Defendant.

25
26 This matter is currently set for a status hearing on September 27, 2016. Mr. Bibbs is
27 currently in state court custody.

28 Defense counsel has contacted Mr. Bibbs' state court counsel who has informed defense
counsel that (1) Mr. Bibbs will remain in state custody beyond September 27 and (2) Mr. Bibbs
is currently litigating a dispositive motion in state court under CPC 995.

1 For these reasons, the parties request that this matter be continued to December 13,
2 2016 to allow sufficient time for all state court matters to be resolved.

3 USPO Shaheen Shan concurs in this request.

4 For these reasons, the parties and the USPO request that the matter be continued until
5 December 13, 2016 at 2:00 PM.

6 So stipulated.
7

Dated: September 19, 2016

Respectfully Submitted,

9 MARTIN SABELLI/s/
10 Counsel for MAURICE BIBBS

11 Dated: September 19, 2016

WILLIAM FRENTZEN /s/
12 Counsel for the United States

13 **[PROPOSED] ORDER**

14 Good Cause Appearing,

15 IT IS HEREBY ORDERED that the next scheduled hearing be continued to December
16 13, 2016 at 2:00 PM.
17

18 Date: September 21, 2016

19 
20 HON. WILLIAM ALSUP
21 UNITED STATES DISTRICT
22 JUDGE
23
24
25
26
27
28